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7 Attorneys for Defendant

8 **IN THE UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10  
11 BRIAN PEELER, individually,  
12  
Plaintiff,

13 vs.

14 RLI INSURANCE COMPANY, an entity  
15 licensed to do business in the State of Nevada;  
16 DOE INDIVIDUALS 1 through 10; XYZ  
17 CORPORATIONS 11 through 20; ABC  
LIMITED LIABILITY COMPANIES 21 through  
30, inclusive,

18 Defendants.  
19

CASE NO.:

**PETITION FOR REMOVAL**

20  
21 TO THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE  
22 DISTRICT OF NEVADA:

23 Defendant RLI INSURANCE COMPANY respectfully petitions the Court for an Order  
24 removing the above-entitled action to the United States District Court and alleges as follows:

- 25 1. RLI Insurance Company is the Defendant in the above-entitled action.  
26 2. The above-entitled action was commenced against Defendant on December 7, 2017,  
27 in the District Court, Clark County, Nevada, and is now pending in such Court as Case No.: A-17-  
28 765885-C.

3. A copy of the Summons and Complaint in Case No.: A765885 was served on Defendant on December 13, 2017. (Exhibit A.) This Notice is filed with the Court within thirty days after service of the original Summons and Complaint in the above-entitled action.

4. The amount in controversy exceeds \$75,000.00. In support of its claim that the amount in controversy exceeds \$75,000.00, Defendant, RLI states as follows:

- a. On or about May 18, 2015, Plaintiff alleges personal injuries from a motor vehicle accident.
- b. As a result of same, Plaintiff alleges to have \$156,932.00 in medical specials.
  - i. \$80,444.00 in past medical bills and
  - ii. \$76,488.00 in future medical bills.
- c. Plaintiff has made a demand of \$500,000 for settlement of his claim.

5. There is diversity of citizenship between Plaintiff and Defendant and this Court has jurisdiction over the above-entitled action pursuant to 28 USC § 1332 and 28 USC §1447:

- a. As alleged in the Complaint, Plaintiff is a resident of the State of Nevada;
- b. Defendant is an Illinois corporation with its principal place of business in Peoria, Illinois.

WHEREFORE, Defendant RLI INSURANCE COMPANY requests that the above-entitled action be removed from the District Court, Clark County, Nevada to this Court.

DATED this 9 day of January, 2018.

STEPHENSON & DICKINSON, P.C.

By: [Signature]

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**CERTIFICATE OF SERVICE**

Pursuant to F.R.C.P. 5(b), I hereby certify that I am an employee of STEPHENSON & DICKINSON and that on this 9 day of January 2018, I caused to be served a copy of the foregoing: PETITION FOR REMOVAL on the party(s) set forth below by:

\_\_\_\_\_ Electronic service pursuant to NECFR 9

\_\_\_\_\_ Placing an original or true copy in a sealed envelope placed for collection and mailing in the United States Mail, at Las Vegas, Nevada, postage prepaid, following ordinary business practices;

\_\_\_\_\_ Facsimile transmission only, pursuant to the amended Eighth Judicial District Court Rule 7.26

✓ \_\_\_\_\_ Case Management/Electronic Case Filing (CM/ECF)

\_\_\_\_\_ Hand Delivery – Receipt of Copy

addressed as follows:

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\_\_\_\_\_  
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